

From: [Kirst, Tina](#)
To: [Martin, Sharon](#)
Cc: [Stanley, Deborah-J](#)
Subject: FW: Arkwood questions from HQ
Date: Tuesday, April 09, 2013 1:37:01 PM

Hi Sharon:

I just received the email below from Stephen Tzhone. He would like the attached email string processed into SEMS-DMS. Please let me know if I can assist. Thanks!!!

Tina Kirst

Tina Kirst
Toeroek Associates, Inc.
Contractor I U.S. Environmental Protection Agency Region 6 Superfund Division
phone: 214-665-2242 I fax: 214-665-7570
email: kirst.tina@epa.gov

From: Tzhone, Stephen
Sent: Tuesday, April 09, 2013 1:29 PM
To: Kirst, Tina
Subject: FW: Arkwood questions from HQ

Tina, Please input the below emails and any attachments into Arkwood SDMS. Thanks, Stephen.

From: Crumbling, Deana
Sent: Tuesday, April 09, 2013 7:50 AM
To: Tzhone, Stephen; Rauscher, Jon
Cc: Berg, Marlene
Subject: FW: Arkwood questions from HQ

Stephen and Jon,

Marlene forwarded the Arkwood materials to me, and I am planning to be on the call tomorrow.

In addition to the objections that Jon had to the Arkwood risk assessment, I'd like to add that their whole premise for where they took samples (in ditches) is faulty. They try to persuade the reader to believe that sampling in ditches would provide "worst case" concentrations. From page 2: "The ditch sample locations were considered likely to capture upper bound PCDD/F concentrations on and near the Site because these compounds are transported predominantly via sediment movement and are well known to accumulate in low lying areas, i.e., 'environmental sinks.'"

Environmental "sinks" such as they describe should accumulate sediment. But the exact opposite occurs at the locations where they sampled. As is clear from the photos and description of the ditches that they provide, these ditches absolutely do not represent "low lying areas or sinks."

During high flow events (when sediments might be transported from the site), the sampled locations in the ditches are subjected to torrential flow that scours those locations and carries sediment away. Page 5: "It should be noted that these samples were collected from zones with embedded rocks, vegetation, and leaf debris, and that rocks and debris were temporarily relocated to obtain sediment samples at 0 to 3 inches depth. All of the sampled ditches or confluence points were partially rock-lined either naturally or artificially in order to maintain ditch integrity."

The fact that these locations are armored with "embedded rock" to "maintain ditch integrity" and have no sediment on top of the rock (rocks had to be moved to get to mud underneath) should have been a clue that these areas DO NOT represent "sinks"! They represent erosional scour, the opposite of a "sink" which would take the form of a depositional feature like a sand bar. Interestingly, the one water feature that could be considered a "sink" for the Site's watershed, the retention pond and its sediment, was NOT sampled (or it was sampled and they didn't report the result).

The data they collected are meaningless when assessing risk from exposure to Site soils.

--Deana

I have migrated to a new email system as of 2/19/13. If you have more than 25 Mb worth of attachments, please contact me first to discuss alternatives to email transfer.

Deana Crumbling, M.S.
Environmental Scientist | Technology Innovation Program
Office of Superfund Remediation & Technology Innovation



Pollinators are not optional

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MC 5203P | 1200 Pennsylvania Ave, NW | Washington, DC 20460

Courier Delivery/Visitors:
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Phone: 703-603-0643 | Fax: 703-603-9135
Email: crumbling.deana@epa.gov

Clean-Up Information Webpage: <http://clu.in.org>
Triad Resource Center: <http://www.triadcentral.org>

From: Berg, Marlene
Sent: Thursday, April 04, 2013 7:11 PM
To: Crumbling, Deana
Subject: FW: Arkwood questions from HQ

Deana,

I have just found out that Region 6 will be holding a meeting next week on the Arkwood site.

I will give you a call as there is a sampling issue here.

Attached are two figures that the region sent, along with the December 2012 risk assessment that the RP (ChemRisk for the RP) put together plus a 2006 article prepared by ChemRisk for the RP.

Marlene

From: Tzhone, Stephen

Sent: Thursday, April 04, 2013 6:41 PM

To: Berg, Marlene; Moran, Gloria-Small

Cc: Luckett, Casey; Rauscher, Jon; Khoury, Ghassan; Villarreal, Chris; Sanchez, Carlos; Moya, Ruben

Subject: RE: Arkwood questions from HQ

Hi Marlene,

1) ICs and liens: I have forwarded your questions on ICs and liens to Gloria Moran the site attorney for responses.

2) Risk assessment: A regulators only call on the dioxin risk assessment is tentatively scheduled for Thur April 11 at 10am Central (11am Eastern). Let me know if that will work for you, I have also attached maps to help with HQ review:

Arkwood_Cells_ppt.pdf: confirmation sampling map (remedial action 1994-1995, prior to covering with 6" topsoil), current imagery overlay

Arkwood_Samples.pdf: PRP screening risk assessment sampling map (Dec 2012), current imagery overlay

Stephen L. Tzhone

Superfund Remedial Project Manager

214.665.8409

tzhone.stephen@epa.gov

From: Berg, Marlene

Sent: Thursday, April 04, 2013 5:14 PM

To: Tzhone, Stephen

Subject: Arkwood questions

Steve,

After I talked to you, I had a good conversation with Jon Rauscher about the site.

Jon will be sending me a copy of the RP's risk assessment.

Be that as it may, I had one or two questions for you.

What ICs were put into place?

And, are there any liens on the property?

Thanks

Marlene